

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE: ALIBABA GROUP LTD.  
SECURITIES LITIGATION

Master File No. 1:20-CV-09568-GBD-JW

**NOTICE OF MOTION AND MOTION FOR AN AWARD OF  
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:**

**PLEASE TAKE NOTICE** that, pursuant to the Court's Order Preliminarily Approving Settlement and Providing for Notice (ECF No. 139), on March 27, 2025, at 10:00 a.m., before the Honorable George B. Daniels, in Courtroom 11A at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, NY 10007, Lead Counsel Glancy Prongay & Murray LLP will and hereby does move the Court for entry of an Order awarding attorneys' fees in the amount of 25% of the Settlement Fund (or \$108,375,000, plus interest earned at the same rate as the Settlement Fund) and reimbursement of Litigation Expenses in the total amount of \$1,110,752.68 (comprised of \$1,025,752.68 in out-of-pocket costs incurred by Lead Counsel, and an aggregate of \$85,000 to Court-appointed lead plaintiff Salem Gharsalli (\$25,000), and additional representative plaintiffs Laura Ciccarello, Dineshchandra Makadia, and Wusheng Hu (\$20,000 each), as authorized by the Private Securities Litigation Reform Act of 1995, 15 U.S.C. § 78u-4(a)(4)).<sup>1</sup>

This motion is based on this Notice of Motion; the Memorandum of Law in support thereof; the Declaration of Kara M. Wolke in Support of: (I) Plaintiffs' Motion for Final Approval of Class Action Settlement and Plan of Allocation; and (II) Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court. Defendants take no position on this motion.<sup>2</sup>

---

<sup>1</sup> Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Settlement, dated October 25, 2024. *See* ECF No. 136-1.

<sup>2</sup> A proposed Order granting the requested relief will be submitted with Lead Counsel's reply papers after the deadline for objecting to the motion has passed.

Dated: February 20, 2025

**GLANCY PRONGAY & MURRAY LLP**

By: /s/ Kara M. Wolke

Robert V. Prongay (*pro hac vice*)

Kara M. Wolke (*pro hac vice*)

Joseph D. Cohen (*pro hac vice*)

Jason L. Krajcer (*pro hac vice*)

Melissa C. Wright (*pro hac vice*)

Raymond D. Sulentic (*pro hac vice*)

1925 Century Park East, Suite 2100

Los Angeles, California 90067

Telephone: (310) 201-9150

Email: rprongay@glancylaw.com

kwolke@glancylaw.com

jcohen@glancylaw.com

jkrajcer@glancylaw.com

mwright@glancylaw.com

rsulentic@glancylaw.com

*Lead Counsel for Plaintiffs and the Settlement Class*

Jeremy A. Lieberman

Jonathan D. Park

**POMERANTZ LLP**

600 Third Avenue

New York, New York 10016

Telephone: (212) 661-1100

Email: jalieberman@pomlaw.com

jpark@pomlaw.com

Patrick V. Dahlstrom

**POMERANTZ LLP**

10 South LaSalle Street, Suite 3505

Chicago, Illinois 60603

Telephone: (312) 377-1181

pdahlstrom@pomlaw.com

Peretz Bronstein

**BRONSTEIN, GEWIRTZ & GROSSMAN, LLC**

60 East 42nd Street, Suite 4600

New York, New York 10165

Telephone: (212) 697-6484

Email: peretz@bgandg.com

Frank R. Cruz

**THE LAW OFFICES OF FRANK R. CRUZ**

1999 Avenue of the Stars, Suite 1100

Los Angeles, CA 90067

Telephone: (310) 914-5007

Email: [info@frankcruzlaw.com](mailto:info@frankcruzlaw.com)

Lesley Portnoy

**THE PORTNOY LAW FIRM**

1800 Century Park East, Suite 600

Los Angeles, CA 90067

Telephone: 310-692-8883

Email: [lesley@portnoylaw.com](mailto:lesley@portnoylaw.com)

*Additional Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document was electronically filed with the Clerk of Court via the CM/ECF system, which will send Notice of such filing to all counsel of record.

Dated: February 20, 2025

/s/ Kara M. Wolke

Kara M. Wolke